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11 *Attorneys for Plaintiff Gena Hanson, Individually*
12 *and on Behalf of All Others Similarly Situated*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **GENA HANSON**, individually and on behalf
16 of all others similarly situated,

17 Plaintiff,

18 v.

19 **JQD, LLC, d/b/a PRO SOLUTIONS**, a California
20 corporation;

21 Defendant.
22 _____

) Case No. 4:13-cv-05377-RS
)
)

) **DECLARATION OF GINA DI GIUSTO IN**
) **SUPPORT OF MOTION FOR**
) **PRELIMINARY APPROVAL OF**
) **SETTLEMENT**

) The Honorable Richard Seeborg
)
)

1 I, GINA DI GIUSTO, hereby declare as follows:

2 1. I am an attorney at the non-profit legal services organization Housing and Economic
3 Rights Advocates (HERA) in Oakland, California and an attorney for Plaintiff Gena Hanson
4 ("Plaintiff") and the purported class in the above-entitled action. I am admitted to practice law
5 before this Court and all state courts in the State of California. I submit this declaration in support of
6 the Motion for Preliminary Approval of Settlement in this action. I have personal knowledge of the
7 matters set forth herein, and if called to testify, would and could competently testify to them.

8 2. Housing and Economic Rights Advocates ("HERA) is a California statewide, not-
9 for-profit legal service and advocacy organization. HERA has provided advice, counseling, and
10 representation to thousands of California consumers since its founding in 2005. In recent years,
11 HERA's work has focused on asset preservation and preventing foreclosure. Since 2012, HERA has
12 counseled over one-hundred and fifty (150) current and former homeowners who have experienced
13 collection problems on debts specifically derived from homeowner association ("HOA")
14 assessments. Moreover, HERA has provided training on HOA collections for homeowner attorneys
15 through the Practicing Law Institute and was amicus curiae on behalf of the appellant homeowner in
16 *Huntington Continental Townhouse Assn., Inc. v. Miner*, 230 Cal. App. 4th 590 (Cal. App. 4th Dist.
17 2014).

18 3. HERA's attorneys have extensive experience in consumer protection and/or class
19 action litigation in state and federal court, including a number pertaining to the Fair Debt Collection
20 Practices Act, such as, for example: *Herrera v. LCS Fin. Servs. Corp.*, 274 F.R.D. 666 (N.D. Cal.
21 2011).

22 4. The settlement between Plaintiff Gena Hanson and Defendant Pro Solutions was
23 reached at a settlement conference with Hon. Magistrate Judge Kandis Westmore. The settlement
24 conference was held on March 9, 2016.

25 5. Ms. Gena Hanson submitted to deposition by Pro Solutions in this matter and
26 attended the all-day settlement conference session on March 9, 2016.

6. I have investigated the facts available to me and the applicable law. Based on the foregoing, and upon an analysis of the benefits which this settlement agreement affords the class, I consider it to be in the best interest of the class to enter into this settlement agreement.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 8th Day of September 2016 at Oakland, California.

GINA DI GIUSTO